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**UNITED STATES DISTRICT COURT FOR
THE CENTRAL DISTRICT OF CALIFORNIA**

MAYA LAU,

Plaintiff,

v.

COUNTY OF LOS ANGELES; ALEX
VILLANUEVA; MARK LILLIENFELD;
and TIM MURAKAMI,

Defendants.

Case No.: 2:25-cv-4766

**FIRST AMENDED
COMPLAINT FOR DAMAGES
AND OTHER RELIEF**

JURY TRIAL DEMANDED

**42 U.S.C. § 1983: First
Amendment; Conspiracy to
Deprive Constitutional Rights;
Monell.**

1 Pursuant to 42 U.S.C. § 1983 and 28 U.S.C. § 1331, Plaintiff MAYA LAU,
2 by her undersigned attorneys, complains of Defendants ALEX VILLANUEVA,
3 MARK LILLIENFELD, TIM MURAKAMI, and COUNTY OF LOS ANGELES,
4 and states as follows:

5 INTRODUCTION

6 1. To protect a free press, the First Amendment provides virtually
7 absolute protection for a journalist’s right to publish “lawfully obtain[ed] truthful
8 information about a matter of public significance,” regardless of the information’s
9 source. *Bartnicki v. Vopper*, 532 U.S. 514, 528 (2001) (quoting *Smith v. Daily Mail*
10 *Publ’g Co.*, 443 U.S. 97, 103 (1979)).

11 2. From the Pentagon Papers to articles that revealed the risks of
12 tobacco, some of the most consequential investigative reporting of the last century
13 has relied on confidential information that powerful entities wanted to keep secret
14 from the American public. *See N.Y. Times Co. v. United States*, 403 U.S. 713, 717
15 (1971) (Black, J., concurring) (“The press was protected so that it could bare the
16 secrets of government and inform the people.”).

17 3. But last year, Maya Lau—a reporter who previously covered the Los
18 Angeles County Sheriff’s Department (“LASD”) for the *Los Angeles Times*—
19 learned that the Department’s leadership launched a retaliatory investigation of her
20 due to her work and referred her for criminal prosecution because of her lawful

1 reporting and coverage of deputy misconduct. *See* Keri Blakinger & Alene
2 Tchekmedyian, *Times Reporter Was Leaked List of Problem Deputies. The*
3 *Sheriff's Department Investigated Her*, L.A. Times (July 20, 2024),
4 <https://perma.cc/NKR5-XRA6>.

5 4. In December 2017, Ms. Lau and two then-colleagues published an
6 article discussing a “Brady List” that was maintained by LASD. *See* Maya Lau,
7 Ben Poston & Corina Knoll, *Inside a Secret 2014 List of Hundreds of L.A.*
8 *Deputies with Histories of Misconduct*, L.A. Times (Dec. 8, 2017),
9 <https://perma.cc/HA8V-QMN2>.

10 5. The Brady List—named for the Supreme Court’s landmark 1963
11 decision in *Brady v. Maryland*, which requires prosecutors to disclose evidence
12 that could weaken the credibility of prosecution witnesses—catalogued roughly
13 300 LASD deputies with histories of dishonesty or other misconduct that made
14 them open to impeachment as trial witnesses.

15 6. LASD created the Brady List in order to keep track of deputies whose
16 backgrounds could undermine their credibility if the deputies were to testify in a
17 criminal case.

18 7. Ms. Lau’s reporting, which was published after months of research,
19 documented that some deputies on the Brady List had kept their jobs—and, in
20

1 some cases, had even been promoted—despite grave misconduct, including sexual
2 assault, fabricating evidence, and using excessive force.

3 8. At the time, California had excessively strict privacy laws that were so
4 protective of officer personnel files that even prosecutors could not access the
5 Brady List.

6 9. At a time of widespread debate around police misconduct, Ms. Lau’s
7 coverage of the Brady List provided evidence that LASD continued to employ and
8 even reward officers with histories of misconduct. Her work provided an example
9 of the type of critical information about deputies that was not being handed over to
10 prosecutors or defense counsel in cases in which the deputies would testify—an
11 apparent violation of defendants’ constitutional rights.

12 10. The series prompted new oversight of LASD’s role in past
13 prosecutions, *see, e.g.*, Maya Lau, Ben Poston & Corina Knoll, *D.A. Examining*
14 *Past Criminal Cases Involving L.A. Sheriff’s Deputies on a Secret List of Problem*
15 *Officers*, L.A. Times (Jan. 12, 2018), <https://perma.cc/X66B-YWRM>, and helped
16 inspire California legislation that brought greater transparency to police
17 disciplinary records statewide, *see* Blakinger & Tchekmedyian, *supra*.

18 11. But leadership at LASD was furious that its Brady List had been
19 revealed.

1 12. Without any basis for believing that Ms. Lau had committed a crime,
2 LASD, under then-Sheriff Jim McDonnell, opened an investigation into Ms. Lau
3 shortly after she published her article. The investigation did not reveal any
4 evidence suggesting that Ms. Lau had committed a crime.

5 13. A few years later, after a new sheriff, Alex Villanueva, was elected
6 and took office, LASD conducted *another* investigation into Ms. Lau as part of a
7 broader campaign to target Villanueva’s perceived opponents. *See* Alene
8 Tchekmedyian, *L.A. County Sheriff’s Unit Accused of Targeting Political Enemies,*
9 *Vocal Critics*, L.A. Times (Sept. 23, 2021), <https://perma.cc/3ZL8-WMNE>
10 (describing the formation of Sheriff Villanueva’s “Civil Rights and Public Integrity
11 Detail,” which led retaliatory investigations into critics of the Department);
12 Blakinger & Tchekmedyian, *supra* (reporting that the same unit investigated Lau).

13 14. Like its first investigation, LASD opened this second criminal
14 investigation only because Ms. Lau had published her article discussing the Brady
15 List.

16 15. The second investigation did not reveal that Ms. Lau had committed
17 any crimes either. Nevertheless, LASD recommended that Ms. Lau be prosecuted
18 for conspiracy, theft of government property, unlawful access of a computer,
19 burglary, and receiving stolen property.
20

1 16. In May 2024, the California Attorney General declined to prosecute
2 Ms. Lau, stating that there was “insufficient evidence” to merit criminal charges.
3 Blakinger & Tchekmedyian, *supra*.

4 17. LASD’s unlawful investigation and referral for prosecution violated
5 Ms. Lau’s rights under the First Amendment.

6 18. Unfortunately, that overreach was not an isolated error. Instead, the
7 violation of Ms. Lau’s rights was the product of an unlawful conspiracy, and it was
8 conducted pursuant to an official policy or practice of pursuing retaliatory criminal
9 charges against perceived opponents of LASD, adopted by senior LASD officials
10 who acted as final policymakers for the County.

11 19. As the Los Angeles County Sheriff Civilian Oversight Commission
12 documented as early as 2021, Villanueva’s hand-picked Civil Rights and Public
13 Integrity Detail—reporting “directly to the undersheriff”—was responsible for a
14 series of retaliatory investigations “accusing public officials and other
15 professionals who are in conflict with the department of committing crimes,”
16 investigations intended “to chill oversight of the Department, not to pursue a
17 prosecution.” L.A. Cnty. Sheriff Civilian Oversight Comm’n, Villanueva
18 Administration’s Investigation of Oversight Officials, Etc. at 1, 7 (May 27, 2021),
19 <https://perma.cc/VD9H-2EDT>.

20 20. The same unit was responsible for the investigation of Ms. Lau.

1 21. Ms. Lau brings this suit to obtain accountability for a pattern of
2 unconstitutional misconduct that threatens the rights of reporters and freedom of
3 the press in Los Angeles.

4 **JURISDICTION AND VENUE**

5 22. This action is brought pursuant to 42 U.S.C. §§ 1983 *et seq.* to redress
6 the Defendants' tortious conduct and their deprivation of Plaintiff's rights secured
7 by the U.S. Constitution.

8 23. This Court has jurisdiction over Plaintiff's federal claims pursuant to
9 28 U.S.C. § 1331.

10 24. Venue is proper under 28 U.S.C. § 1391(b). Defendant Los Angeles
11 County is located within the U.S. District Court for the Central District of
12 California, and, upon information and belief, all Defendants are residents of
13 California. Additionally, a substantial part of the events giving rise to this case
14 occurred within this jurisdiction—the Los Angeles County Sheriff's Department
15 was the agency responsible for conducting the unlawful investigation into Ms. Lau.

PARTIES

25. Maya Lau was an investigative journalist for the *Los Angeles Times* from 2016 to 2021. Her reporting covered LASD among other topics related to law enforcement and government.

26. Alex Villanueva was the Sheriff of the Los Angeles County Sheriff's Department from 2018 to 2022. Sheriff Villanueva decided to open a criminal investigation into Ms. Lau. Sheriff Villanueva is being sued in his individual capacity and, because he was the final policymaker for the County regarding the investigation of Ms. Lau, he is also being sued in his official capacity.

27. Mark Lillienfeld was a detective in the Los Angeles County Sheriff's Department in 2018. At Sheriff Villanueva's direction, Lillienfeld led the criminal investigation into Ms. Lau. He is being sued in his individual capacity.

28. Tim Murakami was an Undersheriff in the Los Angeles County Sheriff's Department in Fall 2021. Sheriff Alex Villanueva delegated to Undersheriff Murakami his decision-making authority as a final policymaker of the County in connection with the investigation into Ms. Lau. After conducting an unlawful investigation into Ms. Lau, Undersheriff Murakami referred Ms. Lau to the California Attorney General's Office for prosecution. Murakami is being sued in his individual capacity and, because Sheriff Villanueva delegated final

1 policymaking authority for the County to him regarding the investigation of Ms.
2 Lau, he is also being sued in his official capacity.

3 29. Alex Villanueva, Mark Lillienfeld, and Tim Murakami are
4 collectively referred to as “Individual Defendants” in this Complaint.

5 30. Defendant County of Los Angeles is a municipality in California, and
6 is and/or was the employer of each of the Defendants. The County is responsible
7 for indemnifying judgments against Defendants. The County is also responsible for
8 the policies, practices, and customs of the Los Angeles County Sheriff’s
9 Department that caused the unconstitutional investigation and attempted
10 prosecution of Ms. Lau, and Defendants Villanueva and Murakami had final
11 policymaking authority for the relevant policies, practices, and customs of the
12 County.

13 **FACTS**

14 **Ms. Lau’s Reporting**

15 31. On December 8, 2017, the *Los Angeles Times* published a story by
16 Ms. Lau and two colleagues titled “Inside a Secret 2014 List of Hundreds of L.A.
17 Deputies with Histories of Misconduct.” Lau, Poston & Knoll, *supra*.

18 32. The article explained that LASD maintained a “Brady List”—an
19 inventory of roughly 300 LASD deputies with histories of dishonesty or other
20

1 misconduct that made them open to impeachment as trial witnesses—but withheld
2 it from prosecutors and the public.

3 33. The article went on to describe that “Times reporters reviewed a
4 version of the roster” and then “scoured [other] court and law enforcement records
5 for details of how deputies landed on it.” Lau, Poston & Knoll, *supra*.

6 34. The article documented numerous examples of misconduct by LASD
7 deputies who remained employed by the Department—some of whom had
8 continued to rise in the ranks.

9 35. Casey Dowling was among the deputies whom the article discussed as
10 having committed misconduct. Dowling sexually assaulted a 14-year-old girl while
11 working in his capacity as an LASD deputy. The girl had been attacked with a
12 knife and sought the deputy’s help, but after Dowling moved her into his patrol
13 car, he touched her breasts. Dowling then touched her breasts again after he drove
14 her home. Dowling was temporarily relieved of his duties, but he was ultimately
15 reinstated, and he was actively working for LASD’s parks bureau as of August
16 2017.

17 36. The article also reported that the Brady List included Christian
18 Chamness, who pepper-sprayed and arrested an elderly man, then wrote a false
19 report to justify the arrest. Chamness was suspended for 25 days for making a false
20

1 report and using excessive force, but he was still employed by LASD when the
2 article was published.

3 37. Finally, the article reported that the Brady List included Timothy
4 Jimenez, a Sergeant in LASD. When Jimenez was working as a bailiff in 1995, he
5 warned a suspected drug dealer's girlfriend that the dealer was being watched by
6 police. The Deputy District Attorney wrote in a memo that Jimenez's actions put
7 his colleagues' lives in peril, but he was not prosecuted, and Jimenez has since
8 been promoted within the Sheriff's Department.

9 38. Ms. Lau and her colleagues spent months researching the article. They
10 interviewed deputies and corroborated key information through the use of public
11 records.

12 39. Ms. Lau and her editors at the *Times* viewed the information—and the
13 widespread police misconduct it documented—as a matter of clear public concern,
14 particularly in light of the nationwide debate on police accountability and
15 California's extreme approach to officer privacy.

16 40. Ms. Lau's reporting exposed facts about deputies that had been
17 concealed from prosecutors and defendants, in potential violation of *Brady v.*
18 *Maryland*.

19 41. After Ms. Lau and her colleagues published their article, the Los
20 Angeles County District Attorney's Office launched a comprehensive review of

1 past criminal cases that featured deputies whose names appeared on the Brady List.
2 *See* Maya Lau, Ben Poston & Corina Knoll, *D.A. Examining Past Criminal Cases*
3 *Involving L.A. Sheriff's Deputies on a Secret List of Problem Officers*, L.A. Times
4 (Jan. 12, 2018), <https://perma.cc/X66B-YWRM>.

5 42. In 2018, Ms. Lau and her colleagues published a follow-up series
6 showing the damage that California's police privacy laws had done to public
7 safety.¹

8 43. The series helped spur passage of a groundbreaking new law later that
9 year, resulting in critical police officer personnel files being opened to public
10 review for the first time in decades. California lawmakers calling for the measure
11 read aloud portions of the *Times*' reporting from the Assembly floor to highlight
12 the need for reform.

13 44. The new law, California Senate Bill 1421, allowed Ms. Lau and her
14 colleagues to gain access to documents proving that some deputies with histories
15 of serious misconduct had indeed testified in criminal cases without prosecutors or
16 defense counsel being informed of the deputies' prior wrongdoing.

18
19 ¹ *See* Corina Knoll et al., *An L.A. County Deputy Faked Evidence. Here's*
20 *How His Misconduct Was Kept Secret in Court for Years*, L.A. Times (Aug. 9,
21 2018), <https://perma.cc/J2TV-F42W>; Maya Lau, *One Cop Came Forward to*
Expose Secrets in His Own Ranks. The Revelation Rocked the Court System, L.A.
22 Times (Aug. 14, 2018), <https://perma.cc/B4TA-644Y>.

1 45. In 2019, Ms. Lau and a colleague published an article showing that a
2 homicide detective from LASD had been disciplined for punching a suspect and
3 then lying about it. Later, he testified in five murder trials. In all those cases, the
4 defense attorneys told the *Times* they had never been informed that the detective
5 had been previously disciplined for dishonesty. See Maya Lau & Ben Poston, *A*
6 *Homicide Detective's Dishonesty Was Kept Secret for Years. Now it Could Upend*
7 *Criminal Cases*, L.A. Times (Sept. 19, 2019), <https://perma.cc/ZM5T-DWTS>.

8 46. The information uncovered by the *Times* could potentially lead to
9 those criminal cases being overturned.

10 47. In each of those respects, Ms. Lau's reporting on the Brady List
11 played an essential role in promoting a more informed public debate on police
12 accountability in California.

13 **The Initial Investigation**

14 48. Upon information and belief, LASD learned around 2017 that its
15 Brady List had been leaked.

16 49. LASD—led by Sheriff Jim McDonnell at the time—began to
17 investigate people it believed had disseminated the Brady List.

18 50. LASD's investigation turned up no evidence connecting Ms. Lau to
19 any crime.

20 51. In 2018, Alex Villanueva was elected Sheriff of Los Angeles County.

1 52. Shortly after he took office, Sheriff Villanueva created LASD's Civil
2 Rights and Public Integrity Detail. Sheriff Villanueva used this group of officers to
3 target and harass individuals who used their public positions to criticize Sheriff
4 Villanueva and LASD.

5 53. Ms. Lau was one of the victims of the retaliatory investigations led by
6 the Civil Rights and Public Integrity Detail.

7 54. The Civil Rights and Public Integrity Detail opened a criminal
8 investigation into Ms. Lau and referred her for prosecution without any reason to
9 think that she had committed a crime.

10 55. Since it had concluded its initial investigation into the leak of its
11 Brady List, LASD had not uncovered any new evidence suggesting that Ms. Lau
12 had committed a crime.

13 56. Instead, when it opened a second criminal investigation into Ms. Lau,
14 LASD relied on its stale conclusion—already disproven through LASD's first
15 investigation—that Ms. Lau had supposedly committed a crime because she
16 published an article discussing the Brady List.

17 57. Detective Mark Lillienfeld led the second investigation into Ms. Lau.

18 58. LASD's second investigation did not turn up any evidence suggesting
19 that Ms. Lau had committed a crime.
20
..

1 59. Instead, according to the *Times*' reporting, LASD's investigative
2 report was filled with "testy asides and innuendos about Villanueva foes,"
3 evidencing a retaliatory motive for investigating the Department's perceived
4 opponents. Blakinger & Tchekmedyian, *supra*.

5 60. Despite the lack of probable cause, Undersheriff Tim Murakami
6 referred the case to the California Attorney General for prosecution in 2021.

7 61. Sheriff Villanueva had delegated to Undersheriff Murakami the
8 responsibility to decide what action to take as a result of LASD's investigation.
9 This delegation made Undersheriff Murakami the final policymaker in terms of
10 deciding whether or not to refer Ms. Lau for prosecution.

11 62. Undersheriff Murakami alleged that Ms. Lau had engaged in
12 conspiracy, theft of government property, unlawful access of a computer, burglary,
13 and receiving stolen property.

14 63. Ms. Lau did not commit any of these crimes.

15 64. In May 2024, the California Attorney General declined to prosecute
16 because there was "insufficient evidence" to merit criminal charges. Blakinger &
17 Tchekmedyian, *supra*.

18 **LASD's Pattern/Practice of Retaliating Against**
19 **Individuals Who Report Unfavorable Information About LASD**

20 65. The unlawful investigation into Ms. Lau was part of an unlawful
policy and/or practice maintained by LASD, in which LASD leadership opened

1 retaliatory criminal investigations and, ultimately, referred for prosecution
2 individuals who used their public positions to criticize Sheriff Villanueva and
3 LASD.

4 66. This unlawful policy and practice was carried out, in part, by the Civil
5 Rights and Public Integrity Detail, which initiated numerous criminal
6 investigations into individuals who had used their public positions to criticize
7 Sheriff Villanueva and LASD.

8 67. For example, in April 2022, Sheriff Villanueva announced that he had
9 opened a criminal investigation into *Los Angeles Times* reporter Alene
10 Tchekmedyan after she published a story detailing LASD's cover-up of a deputy's
11 use of excessive force.

12 68. At a press conference, Sheriff Villanueva alleged that Tchekmedyan
13 could be prosecuted for conspiracy, burglary, and unauthorized use of a database.
14 Villanueva dropped the criminal investigation only after public outrage.

15 69. Additionally, in 2021, LASD investigated journalist Cerise Castle, a
16 reporter for Knock LA, after she published a history of deputy gangs within LASD.
17 Among the investigative techniques employed by LASD, department employees
18 monitored Castle's social media accounts, compiled dossiers on individuals
19 associated with her work, and described Knock LA in internal emails as one of the
20 "anti-LASD platform(s) we are tracking."

1 70. Sheriff Villanueva's retaliation was not limited to targeting journalists
2 who criticized his administration.

3 71. Using LASD's Civil Rights and Public Integrity Detail, Sheriff
4 Villanueva also targeted public officials who publicly criticized his administration.

5 72. For example, in August 2019, the Civil Rights and Public Integrity
6 Detail opened a criminal investigation into Max Huntsman, the Inspector General
7 of Los Angeles County at the time, after he published a report criticizing Sheriff
8 Villanueva's decision to rehire a deputy who had been fired for domestic violence
9 and dishonesty.

10 73. Sheriff Villanueva had asked Huntsman not to release the report and
11 threatened that, if the report were released, there would be "consequences." The
12 investigation lasted years, and both state and federal prosecutors turned down
13 repeated referrals for prosecution. As Detective Lillienfeld described in a recent
14 deposition, he conducted "surveillance of Mr. Huntsman's home and activities,"
15 searching for trash to rummage through and questioning Huntsman's housekeeper.

16 74. In March 2020, after Los Angeles County supervisors criticized
17 Sheriff Villanueva's handling of the COVID pandemic, the Los Angeles Board of
18 Supervisors voted to remove Sheriff Villanueva as head of the emergency
19 operations center and replace him with the county's chief executive, Sachi Hamai.
20

1 75. In retaliation, Sheriff Villanueva publicly harassed Hamai by, among
2 other things, accusing her of committing a felony for serving on the board of an
3 organization that had voted to support a ballot measure proposing to redirect
4 money away from LASD.

5 76. In February 2021, LASD executed a search warrant on the office of a
6 non-profit ran by Patti Giggans, a commissioner of the Los Angeles County Sheriff
7 Civilian Oversight Commission.

8 77. The Civilian Oversight Commission—and Patti Giggans herself—had
9 criticized Sheriff Villanueva numerous times in the prior years. For instance, the
10 Civilian Oversight Commission requested that Sheriff Villanueva be held in
11 contempt after he refused to appear before the Commission pursuant to a subpoena.
12 Giggans had also publicly voiced her support for the Commission’s calls for
13 Sheriff Villanueva to resign after he resisted oversight attempts and failed to hold
14 deputies accountable for misconduct.

15 78. The Civil Rights and Public Integrity Detail also executed a search
16 warrant on the home of Sheila Kuehl in September 2022, after she had joined calls
17 for Sheriff Villanueva to step down.

18 79. LASD’s investigations into Giggans and Kuehl were baseless. Both
19 state and federal authorities declined LASD’s referrals for prosecution.
20

81. LASD's pattern and practice of opening retaliatory criminal investigations and attempting to prosecute perceived critics was one of the grounds that caused then-California Attorney General Xavier Becerra to open a civil rights investigation into LASD in January 2021.

DAMAGES

84. Ms. Lau's dignity and privacy were violated. She has suffered anxiety since learning about LASD's unlawful investigation.

COUNT I

(First Amendment)

87. Each paragraph of this Complaint is incorporated as if restated fully herein.

89. The Individual Defendants opened a retaliatory criminal investigation into Ms. Lau and referred her for prosecution based solely on her protected receipt of and reporting on the list.

1 91. Being subjected to a retaliatory investigation and/or referred for
2 criminal prosecution would chill a person of reasonable firmness from exercising
3 First Amendment rights.

4 92. Even if probable cause or arguable probable cause had existed to
5 believe Ms. Lau committed a crime, Ms. Lau was investigated and referred for
6 criminal prosecution when otherwise similarly situated individuals not perceived as
7 opponents of LASD have not been.

8 93. While journalists routinely receive and publish leaked information,
9 the offenses the Individual Defendants alleged against Ms. Lau have rarely if ever
10 been applied to a reporter.

11 94. By opening a criminal investigation into Ms. Lau and referring her for
12 prosecution because she reported unfavorable information about LASD, the
13 Individual Defendants engaged in unlawful retaliation against Ms. Lau in violation
14 of the First Amendment.

15 95. In doing so, the Individual Defendants acted under color of law.

16 96. In doing so, the Individual Defendants acted maliciously and with
17 reckless disregard for Ms. Lau's constitutional rights.

18 **COUNT II**

19 **Conspiracy to Deprive Constitutional Rights**

20 *Brought Under 42 U.S.C. § 1983 Against All Individual Defendants*

1 97. Each paragraph of this Complaint is incorporated as if restated fully
2 herein.

3 98. As set forth in the above paragraphs, Defendants Villanueva,
4 Lillienfeld, and Murakami, acting in concert with other co-conspirators, known and
5 unknown, reached an agreement among themselves to open an unlawful
6 investigation into Ms. Lau and refer her for criminal prosecution.

7 99. In doing so, the Individual Defendants and their co-conspirators
8 agreed to accomplish an unlawful purpose and/or a lawful purpose by unlawful
9 means.

10 100. In addition, these co-conspirators agreed among themselves to protect
11 one another from liability for depriving Ms. Lau of her rights.

12 101. In furtherance of their conspiracy, each of these co-conspirators
13 committed overt acts and were otherwise willful participants in joint activity.

14 102. As a result of the Individual Defendants' agreement, Ms. Lau suffered
15 significant loss of privacy, loss of dignity, and other continuous injuries as
16 damages, as set forth in the above paragraphs.

17 103. The misconduct described in this Count was objectively unreasonable
18 and was undertaken intentionally, with malice, and with reckless indifference to
19 Ms. Lau's rights.
20
..

COUNT III

(First Amendment)

105. Each paragraph of this Complaint is incorporated as if restated fully herein.

107. Policymakers acting on behalf of the County—including Sheriff Alex Villanueva and Undersheriff Tim Murakami—opened a criminal investigation into Ms. Lau and referred her for criminal prosecution without having probable cause to do so.

110. As detailed above, the unlawful investigation into Ms. Lau was consistent with LASD's pattern and/or practice of retaliating against individuals who report unfavorable information about LASD, a pattern or practice that caused the violation of Ms. Lau's rights.

WHEREFORE, Plaintiff respectfully requests that this Court enter judgment in her favor and against all Defendants, awarding compensatory damages, nominal damages, punitive damages, attorneys' fees and costs against each Defendant, and any other relief that this Court deems just and appropriate.

Plaintiff, MAYA LAU, hereby demands a trial by jury pursuant to Federal Rule of Civil Procedure 38(b) on all issues so triable.

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